

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF NEW YORK**

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9384-2557 Québec Inc., a Canadian : 1:19-CV-00501-TJM-CFH  
corporation; MINEDMAP, INC., a Nevada  
corporation; and SERENITY ALPHA, LLC, a  
Nevada limited liability, and other similarly  
situated individuals

**DECLARATION OF T. EDWARD  
WILLIAMS, ESQ. IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
LEAVE TO AMEND COMPLAINT**

Plaintiff, :

against : **(ECF Case)**

NORTHWAY MINING, LLC, a New York limited :  
liability company; MICHAEL MARANDA, an  
individual; MICHAEL CARTER, an individual;  
CSX4236 MOTORCYCLE SALVAGE, LLC, a New  
York limited liability company; DROR SVORAI,  
an individual; MINING POWER GROUP, INC., a  
Florida corporation; HUDSON DATA CENTER,  
INC, a New York Corporation, MICHAEL  
MARANDA, LLC, a New York Limited liability  
company; PORTER KING HILL CONTRACTING,  
LLC, a New York limited liability company;  
COINMINT, LLC, a Delaware limited liability  
company; OSWEGO DATA LLC, a New York  
Limited Liability Company; LORI S. THOMPSON,  
LCSW, PLLC, a professional limited liability  
corporation; LORI S. THOMPSON, an individual,  
ANTHONY PORTER, an individual; and DONALD  
D'AVANZO, an individual

Defendants. :

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I, T. Edward Williams, Esq., under penalty of perjury and in reliance with 28 U.S.C. 1746, declare:

1. I am an attorney admitted to practice in the state and federal courts in New York. I have personal knowledge of each statement made below, and the facts in this Declaration because of my employment with Williams LLP, attorneys for Plaintiffs. If called upon and sworn as a witness, I could and would testify competently to the facts in this Declaration.
2. Plaintiffs alleged in their Original Complaint alleged that Michael Maranda, through companies he formed, defrauded them by, among other fraudulent acts, representing he had a facility at 2 Flint Mine Road capable of hosting thousands of bitcoin miners simultaneously. See ECF No. 2; *see also*, ECF. No. 10-2, Affidavit of Ryan Lehmann. (Ryan Lehmann is Michael Maranda's nephew and former president of Northway Mining).
3. Based on Michael Maranda's representations, Plaintiffs collectively deposited more than \$500,000.00 with Michael Maranda to be used for anticipated power costs Michael Maranda would incur had he installed (or plugged in) Plaintiffs' bitcoin miners. As Ryan Lehmann attested to in his Affidavit, however, Michael Maranda did not use Plaintiffs' funds for their intended purpose. ECF No. 10-2, at ¶¶ 3-8. These and other allegations gave rise to claims for RICO violations (Count I), replevin for bitcoin miners (Count II), civil conspiracy (Count III), conversion (Count IV), fraud (Count V), breach of contract (Count VI), fraudulent transfer (Count VII), and unjust enrichment (VIII). ECF No. 2, at *passim*.

4. In late February and early March 2020, I uncovered additional individuals to whom Michael Maranda made fraudulent transfers. I also uncovered additional facts that gave rise to new claims against Michael Maranda, against entities owned by Michael Maranda, and against third parties with whom Michael Maranda associated.

5. I uncovered, for example, that Michael Maranda transferred all or some of Plaintiffs' deposits to Lori Shannon Thompson-Maranda, Michael Carter, Anthony J. Porter, Roseann Maranda, Christine Maranda, and Douglas Maranda—all in an effort to prevent Plaintiffs from reclaiming their deposits and their bitcoin miners. I also uncovered that Michael Maranda moved Plaintiffs' bitcoin miners from 2 Flint Mine to several properties, including the properties at 293 Durkie Lane East Patchogue New York 11738 (Property 1), 38 Oaklawn Avenue Farmingdale New York 11738 (Property 2), and 707 Flats Road Athens, New York 12015 (Property 3) to hide Plaintiffs' bitcoin miners before eventually selling or otherwise disposing of Plaintiffs' bitcoin miners. Maranda continues to operate at warehouses at which some of Plaintiffs' bitcoin miners are present.

6. In late February and again in early March 2020, I spoke with counsel for Michael Maranda, John Harwick, Esq., by phone about amending Plaintiffs' Complaint to assert additional claims and to add additional parties. Mr. Harwick's position stated he would consult with the individuals who were added about representing them.


7. Plaintiffs' Second Amended Complaint includes claims for: aiding and abetting fraud (Count IX), accounting (Count X), and civil theft (Count XI). Plaintiffs Second Amended

Complaint adds the following putative Defendants: Porter King Hill Contracting, LLC, Oswego DATA LLC, Lori Shannon Thompson-Maranda, Lori S. Thompson-Maranda LCSW PLLC, Anthony Porter, Christine Maranda, Roseann Maranda, Douglas Maranda, and Donald D'Avanzo.

8. As set forth in the Notice of Motion and in compliance with L.R. 7.1(b)(2), this Court held a telephone conference on April 20, 2020, at which the parties discussed issues related to Plaintiffs Motion for Leave to Amend their Complaint.

9. Attached to this Declaration as **Exhibit A** is a comparison copy of the proposed amendments to Plaintiffs' Original Complaint. A clean, unsigned copy of Plaintiffs' Second Amended Complaint is attached as **Exhibit B**.

Dated: April 30, 2020.

  
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T. Edward Williams, Esq.